

May 8, 2011

Howard Haley
USM#12029-007
FCI Jesup
2680 hwy 301 S.
Jesup, GA 31599

RECEIVED
DATE May 11, 2011
J. J. J. J.
DEPUTY CLERK
SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK, GEORGIA

Melissa S. Mundell, AUSA
P.O. Box 8970
Savannah, GA 31412

**Re: Offer of Settlement
(Cv210-122)**

Dear Ms. Mundell:

As counsel for the Defendants' in the above cause of action, I forward to you in good faith an offer to bring this litigation to an end. It is undisputed that Plaintiff is permanently disabled and is protected under the American with Disability Act and Rehabilitation Act. It is also undisputed that Plaintiff was unlawfully terminated because of his disability in violation of the aforementioned Acts and Bureau of Prisons Policy.

If this matter should proceed to trial, Plaintiff will present evidence conclusively showing that Unicor(Jesup) has an animus against disabled prisoners'. This fact will be proven by subpoenaing both past and present inmates to prove the above point. Plaintiff will also establish through past inmates that he was terminated because of his disability. Simply put, the entire complex at Jesup fails to meet the minimum requirement mandated by the American with Disability Act.

Considering all factors, Plaintiff remains amicable to a speedy resolution of this matter as listed below:

(i) Immediate reinstatement to UNICOR in a job position consistent with his disability(Bathroom Orderly);

(ii) Nunc pro tunc restoration of all rights and benefits loss as result of unlawful termination;

(iii) Compensatory and Punitive Damages amounting to \$20,000.

(iv) Reimbursement of Court cost and associated expenses amounting to \$500.00

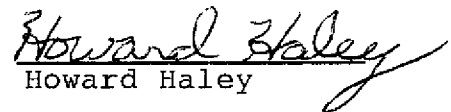
(V) Attorney fees of \$5,000.00

(vi) Immediate cessation of discriminatory practices.

If the above terms are agreeable to the Defendants', Plaintiff will concur in the voluntary dismissal of said cause of action. The amount requested is paltry to the amount that could be recovered in a jury trial and the cost associated in defending said action. The Defendants' actions were not done by mistake but was purposeful and discriminatory.

I earnestly look forward to hearing from you in the near future. This request is made in all good faith.

Submitted by,


Howard Haley

cc: Judge Graham